

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re FLINT WATER CASES

CIVIL ACTION
FILE NO. 5:16-cv-10444

Hon. Judith E. Levy

**CO-LIAISON COUNSEL’S PROPOSED AGENDA ITEMS
RELATED TO DECEMBER 21, 2022, STATUS CONFERENCE**

Co-Liaison Counsel hereby submits the following proposed agenda items for the conference scheduled on December 21, 2022:

1. On November 30, 2022, during the most recent status conference, the Court required counsel for VNA to, *inter alia*, provide Pierre Farcot’s most recent address to counsel. VNA filed ECF No. 2297 in connection with that request. The pleading is vague and ambiguous, and Co-Liaison Counsel requests the opportunity to address this issue.
2. On November 23, 2022, Co-Liaison Counsel has served a deposition subpoena, for December 28, 2022, on **Francis X. Ferarra**, a former employee of VNA. Per the Court’s Case Management Order, the undersigned provided the “as-served” subpoena on the parties to the litigation through all counsel of record. Veolia sent an email objecting to

the deposition and requested a *meet and confer*. The parties met and conferred on November 28, 2022, wherein VNA claimed it would be filing a motion of some kind related to the deposition. To date, nothing has been filed by the deponent, his counsel, or VNA. Counsel requests the opportunity to address this issue.

This, the 14th day of December 2022.

LEVY KONIGSBERG, LLP

/s/ COREY M. STERN

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CERTIFICATE OF SERVICE

I hereby certify that on December 14th, 2022, I caused the within pleading to be served electronically on counsel of record for all parties to the above-captioned action at their e-mail addresses on file with the Court.

LEVY KONIGSBERG, LLP

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